

EXHIBIT C

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

W.A. FOOTE MEMORIAL HOSPITAL
d/b/a ALLEGIANCE HEALTH,
a Michigan Nonprofit Corporation,

Case No.
Hon.

Plaintiff,

v.

CORIZON HEALTH, INC.
a Delaware Corporation,

Defendant.

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*Attorneys for Plaintiff W.A. Foote Memorial
Hospital d/b/a Allegiance Health*

AFFIDAVIT OF ROBIN DAMSCHRODER

I, Robin Damschroder, in my capacity as Executive Vice President of Finance and Administration and Chief Financial Officer of Henry Ford Health, solemnly affirm under penalty of perjury and upon the best of my knowledge, hereby state the following:

1. I am of legal age, competent to testify to the matters stated herein, and know the following to be true based on upon personal knowledge.

2. I am the Executive Vice President of Finance and Administration and Chief Financial Officer of Henry Ford Health.

3. W.A. Foote Memorial Hospital d/b/a Allegiance Health (“Allegiance”) is a hospital within the Henry Ford Health system.

4. Allegiance is a Michigan nonprofit corporation with its principal place of business in Jackson, Michigan. Allegiance is a health care provider and accredited hospital.

5. As the Executive Vice President of Finance and Administration and Chief Financial Officer of Henry Ford Health, I am familiar with the business accounts that Allegiance has with its customers, including amounts of money that remain due and owing.

6. I have reviewed a copy of the complaint against Defendant Corizon Health, Inc. (“Corizon”), as well as the referenced exhibits (collectively, the “Complaint”).

7. Attached as Exhibit A to the Complaint is a true and correct copy of the Agreement between Allegiance and Corizon whereby Allegiance agreed to provide professional health care services to prison inmates under the care of Corizon pursuant to Corizon's agreement with the Michigan Department of Corrections (the "MDOC").

8. Attached to the Complaint as Exhibit B is a true and correct copy of a statement of Corizon's account with Allegiance, which reflects the amounts owed by Corizon to Allegiance for the unpaid reimbursements of health care services rendered, and accrued interest, pursuant to the Agreement. The statement of account represents the bona fide amount owed by Corizon to Allegiance and does not include amounts for disputed claims or partial payments. As set forth therein, the total amount owed by Corizon is \$4,241,098, which includes the total unpaid reimbursements of health care services rendered in the amount of \$3,903,229, plus interest in the amount of \$337,869.

9. To date, Corizon has not stated an objection, nor has it disputed this amount as due and owing.

[Signature Page To Follow]

I declare under penalty of perjury that the above statements are true and accurate to the best of my knowledge, information, and belief.


Robin Damschroder

Executed on this 18th day of Aug, 2022.

Subscribed and Sworn to Before me
this 18 day of AUGUST, 2022


Notary Public

BARBARA CAMPOS
NOTARY PUBLIC - MICHIGAN
OAKLAND COUNTY
ACTING IN THE COUNTY OF WAYNE
MY COMMISSION EXPIRES 04/27/2027